

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LEONITUS JABIR BEY,
Plaintiff,

C.A. NO.: 19-10219- PBS

v.

DAVID PENDER,
Defendant

**FIRST REQUEST OF THE DEFENDANT FOR THE
PRODUCTION OF DOCUMENTS BY THE PLAINTIFF**

Request No. 1

Copies of any and all doctors' reports and/or hospital reports or other medical records concerning the treatment or evaluation by any physicians, psychiatrists, psychologists, dentists, nurses or any other medical practitioner with reference to the plaintiff.

Request No. 2

Copies of full and complete records of any and all hospitals, doctors, or other medical practitioners by whom plaintiff was treated in the three (3) year period to the present.

Request No. 3

Copies of any and all photographs relating in any way to the allegations in the complaint.

Request No. 4

Complete and itemized copies of any and all medical bills incurred by or on behalf of the plaintiff with regard to all injuries alleged by the plaintiff in the complaint.

Request No. 5

Copies of any and all incident reports, including police reports, relating to the alleged incident(s) of the plaintiff's complaint.

Request No. 6

Copies of all signed and/or unsigned statements recorded by mechanical and/or electronic means made by or on behalf of the plaintiff which are in the possession of the plaintiff or under his control and which relate directly or indirectly to the allegations made in the plaintiff's complaint.

Request No. 7

Copies of all signed and/or unsigned statements recorded by mechanical and/or electronic means made by employees or agents of the Defendant which are in the possession of the plaintiff or under his control and which relate directly or indirectly to the allegations made in the plaintiff's complaint.

Request No. 8

Copies of all signed and/or unsigned statements recorded by mechanical and/or electronic means made by or on behalf of any other witnesses which are in the possession of the plaintiff or under his control which relate directly or indirectly to the allegations made in the plaintiff's complaint.

Request No. 9

Copies of all correspondence and reports made by the plaintiff to any police department or any other governmental agency, including the Defendant, with regard to any of the allegations made in the plaintiff's complaint.

Request No. 10

Copies of any and all applications, notices, proofs of loss, reports, letters or correspondence sent or submitted by the plaintiff to any insurance company or its agents dealing

with any physical infirmity, defect, injury or property damage relating directly or indirectly to the allegations in the plaintiff's complaint.

Request No. 11

Copies of any and all documentary evidence that the plaintiff intends to offer at the time of trial.

Request No. 12

Copies of any and all reports submitted by experts retained in this matter whether or not said expert(s) will testify at time of trial.

Request No. 13

Copies of the plaintiff's federal income tax returns for the years 2015 through the present, or, in the alternative, a release for said records is attached for the plaintiff's signature.

Request No. 14

A copy of the plaintiff's criminal records, if any, from the Criminal History Systems Board of the Commonwealth of Massachusetts, or, in the alternative, a release for said records is attached for the plaintiff's signature.

Request No. 15

Copies of any and all probation records since 2009.

Request No. 16

Any and all records which show the plaintiff suffered injuries, including emotional trauma, discomfort and embarrassment, due to the actions of the defendant as is alleged in the plaintiff's complaint.

Request No. 17

All documents from the criminal case at the Lowell District Court arising from the incident which is the subject matter of this civil action.

Request No. 18

Copies of any and all documents that the plaintiff intends to rely on to show that the defendant violated the plaintiff's state constitutional or civil rights as alleged in the complaint.

Request No. 19

Copies of any and all documents that the plaintiff intends to rely on to show that the defendant falsely arrested and falsely imprisoned him.

Request No. 20

Copies of any and all documents that the plaintiff intends to rely on to show that the defendant assaulted and battered him.

Request No. 21

Copies of any and all documents that the plaintiff intends to rely on to show that the defendant acted negligently towards him.

Request No. 22

Copies of any and all documents that the plaintiff intends to rely on to show that the defendant caused him either an intentional infliction of emotional distress, and/or, a negligent infliction of emotion distress.

The Defendant,

By his attorney,

Bradford N. Louison, Esq. BBO#305755
blouison@lccplaw.com
Louison, Costello, Condon & Pfaff, LLP
101 Summer Street
Boston, MA 02110
(617) 439-0305

Date: November __, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this day, I caused the foregoing to be served by first class mail to:

Leonitus Jabir Bey
P.O. Box 1934
Lowell, Mass 01854

Bradford N. Louison

Date: November __, 2019